85) 12/18/00 -19

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK, : NO.: 1:CV01-0764

Plaintiff

V.

(JUDGE CALDWELL)

MARTIN HORN, Secretary,

Pennsylvania Department of :

Corrections; ROBERT MEYERS,

Superintendent, State Correctional: JURY TRIAL DEMANDED

Institution at Rockview;

WEXFORD HEALTH SOURCES, :

INC., Health Care Provider at :

the State Correctional Institution :

at Rockview; JOHN SYMONS, :

M.D., Medical Director, State :

Correctional Institution at :

Rockview; LARRY LIDGETT,

Health Care Administrator, :

State Correctional Institution at

Rockview,

Defendants:

FILED HARRISBURG, PA

DEC 1 7 2002

MARY E. D'ANDRE C. C. Per _______

DEFENDANTS, WEXFORD HEALTH SOURCES, INC. AND IOHN SYMONS, M.D.'S MOTION FOR ENLARGEMENT OF TIME

AND NOW, come Defendants, Wexford Health Sources, Inc. and John Symons, M.D., by and through their attorneys, Lavery, Faherty,

Young & Patterson, P.C., and file this Motion for Enlargement of Time and in support thereof, aver as follows:

- 1. On December 4, 2002, Defendants, Wexford Health Sources, Inc. and John Symons, M.D., filed a Motion for Summary Judgment pursuant to Rule 56(c).
- 2. Pursuant to the Local Rules of Court, the Brief, Fact Statement and Appendix of Exhibits in support of that dispositive motion are due on December 18, 2002.
- 3. Due to previously scheduled commitments in other matters, undersigned defense counsel is in need of a two-day extension of time within which to file the documents in support of the pending dispositive motion.
- 4. The requested extension of time is brief in duration; it will not prejudice Plaintiff's substantive rights; and it will not unduly delay the adjudication of this matter on the merits.

WHEREFORE, Defendants, Wexford Health Sources, Inc. and John Symons, M.D., respectfully request that this Honorable Court grant their Motion for Enlargement of Time and enter the accompanying Court Order.

DATE: __12/17/02

Respectfully submitted,

Lavery, Faherty, Young & Patterson, P.C.

By:_

Document 85

James D. Young, Esquire

Atty No. 53904

225 Market Street, Suite 304

P.O. Box 1245

Harrisburg, PA 17108-1245

Attys for Defendants,

Wexford Health Sources, Inc.

and John Symons, M.D.

CERTIFICATE OF SERVICE

I, Linda L. Gustin, an employee with the law firm of Lavery, Faherty, Young & Patterson, P.C., do hereby certify that on this 17th day of December, 2002, I served a true and correct copy of the foregoing Defendants, Wexford Health Sources, Inc. and John Symons, M.D.'s Motion for Enlargement of Time via U.S. First Class mail, postage prepaid, addressed as follows:

William Clark SCI-Rockview Box A Bellefonte, PA 16823-0820

John Talaber, Esquire Office of Chief Counsel PA Department of Corrections 55 Utley Drive Camp Hill, PA 17011

Linda L. Gustin

aa L. Gustin